

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

FLAME S.A.

Plaintiff,

V.

m/v LYNX, her engines, freights, apparel,  
appurtenances, tackle, etc., in rem

Defendant.

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**C.A. No. 10-cv-00278-RC**  
**IN ADMIRALTY, Rule E**

**DECLARATION OF IOANNIS VEKRIS**

I, **Ioannis Vekris**, pursuant to Section 1746 of Title 28 of the United States Code, hereby declare and say the following under penalty of perjury:

1. I am an individual of sound mind and body, and have never been convicted of a crime of moral turpitude.

2. This declaration is respectfully submitted in support of non-party, alleged alter-ego CAMELA NAVIGATION INC. (hereinafter "CAMELA") in support of the motion to vacate a pending Rule C vessel arrest of the M/T LYNX and to dismiss the U.S. legal proceedings.

3. I am a citizen of Greece and a resident of Athens. I am the legal advisor and a shareholder of CAMELA.

4. I make this declaration based upon my personal knowledge, official company records and my own investigation.

5. CAMELA was founded and incorporated on March 16, 2006. Attached hereto as Exhibit "1" is a copy of the company's Certificate of Incorporation.

6. CAMELA is a corporation existing by virtue of the laws of the Marshall Islands with its registered address at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Isl. MH 96960

7. I am aware that Plaintiff arrested the M/T LYNX, pursuant to a Warrant of Arrest issued in the above captioned action, in order to, *inter alia*, satisfy a judgment against Primera Maritime (Hellas), Ltd. (hereinafter "Primera").

8. The M/T LYNX has never been owned, operated, or managed by Primera.

9. CAMELA is the registered Owner of the M/T LYNX. The technical manager of the vessel is V. Ships Limited (hereinafter "V. Ships"), and Chemnav Shipmanagement Ltd. (hereinafter "Chemnav") is the commercial manager of the vessel. A copy of the Lloyd's MIU report for the M/T LYNX is attached hereto as Exhibit "2." A copy of a letter from V-Ships confirming that they have been the managers since the Vessel's construction is also attached as "Exhbit 3".

10. This wrongful arrest is causing CAMELA to suffer substantial damages, a complete disruption of business operations, and loss of reputation in the commercial marketplace in an already depressed and niche chemical tanker market where CAMELA is struggling to break even.

11. Plaintiff has not and cannot assert any factual grounds upon which to base any claim, let alone a proper maritime claim *in rem*, against the M/T LYNX in the present action, or anywhere else in the world.

12. Plaintiff does not have grounds to arrest the M/T LYNX.

13. Primera is not the "beneficial owner" of the M/T LYNX.

14. Moreover, Plaintiff has wrongfully alleged that Primera is the parent of CAMELA. *See* Verified Complaint, ¶ 20. This is incorrect; Primera does not own directly or indirectly any stock in CAMELA.

15. I am aware that Plaintiff has alleged that CAMELA is an “alter ego subsidiary” of Primera.

16. Plaintiff has not asserted any supportable factual grounds upon which to allege such a relationship.

17. Plaintiff has not and cannot rebut that any corporate relationships that CAMELA has are at arms-length. Moreover, Plaintiff has not provided any evidence that Primera exercises dominion or control over CAMELA.

18. I hereby declare that CAMELA is a completely separate and distinct legal entity, independently financed and operated from Primera.

19. CAMELA does not share common or overlapping stock ownership with Primera.

20. CAMELA and Primera are not partners or joint venturers

21. CAMELA is its own unique and separate profit center and has its own distinct Balance Sheet as well as separate Profit & Loss Accounts all independently audited by Price Waterhouse Coopers, CAMELA maintains its own independent Bank Accounts

22. CAMELA does not hold or use the property or assets of Primera as its own.

23. CAMELA observes formal legal requirements regarding all corporate activities in all material respects.

24. The Mortgage for the M/T LYNX (*See* Verified Complaint, Exhibit E) and the Loan Facility Agreement (*See* Verified Complaint, Exhibit F) do not establish that Primera is the “beneficial owner” of the M/T LYNX as alleged by Plaintiff. These

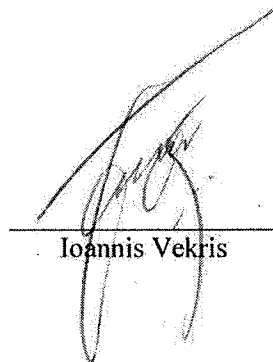
documents confirm that CAMELA is the registered owner of the M/T LYNX and has been since the construction of the Vessel.

25. Plaintiff has not and cannot allege any existence of fraud, wrongdoing or injustice to third parties by CAMELA.

26. I hereby declare that the company, CAMELA, is a separate legal entity from Primera and vice versa.

I hereby declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated: May 15, 2010  
Athens, Greece



Ioannis Vekris

## EXHIBIT 1

**REPUBLIC OF THE MARSHALL ISLANDS  
OFFICE OF THE REGISTRAR OF CORPORATIONS**

**CERTIFICATE OF INCORPORATION**

I HEREBY CERTIFY that

**CAMELA NAVIGATION INC.**

is duly incorporated and has filed articles of incorporation under the provisions of the Marshall Islands Business Corporations Act on

**March 16, 2006**

WITNESS my hand and the official seal of the  
Registry on **March 16, 2006**.



*C. Kastriana*

Deputy Registrar

18152

## EXHIBIT 2

# Lloyd's MIU

The premier source of maritime information

## Lynx

**IMO:** 9388223  
**Flag:** Marshall Islands  
**Reg. Owner:** Camela Nav. Inc.  
**Type:** Combined Chemical And Oil Tanker  
**Status:** Live

## Vessel Overview

Details of the vessel including registration, dimensions, ownership and other characteristics...updated 24/7

**Name** Lynx  
**IMO** 9388223  
**Status** Live  
**Flag** Marshall Islands  
**Type** Combined Chemical And Oil Tanker  
**Year of build** 2008  
**DWT** 13117  
**GT** 8542  
**Contact** Chemnav Inc.  
**Hull Type** DH

## Registration (Name, Flag, Callsign, IMO, MMSI)

**Name** Lynx since: 28 Jul 2008  
**Flag** Marshall Islands , From: 14 October 2008  
**Callsign** V7PE4  
**IMO** 9388223  
**MMSI** 538 003213  
**Port of Registry** Majuro

## Tonnages (GT, Net DWT)

**GT** 8542  
**Net** 4117  
**DWT** 13117  
**Formula DWT** 12469

Tonnage History	From	Until	GT	Net	DWT	Formula DWT
	Before 04 Dec 2008		8542	4117	13117	12469
	Before 01 Apr 2006	Before 03 Dec 2008	8562	4095	13022	12469

## History (Construction Details, Launch Details)

**Construction**  
**Yard Number:** 1165  
**Built By:** Sekwang Heavy Industries Co. Ltd  
**Built At:** Ulsan  
**Ordered:** Before 01 Apr 2006  
**Scheduled:** In the month of 01 Oct 2008  
**Construction start:** 20 Mar 2008  
**Construction end:** 27 Oct 2008

**Launch**  
**Launched:** 28 Jul 2008  
**First Movement:** n/a

## Dimensions (Breadth, Depth / Draught, Length)



<b>Breadth</b>	<b>Extreme:</b>	20.4m
	<b>Moulded:</b>	20.4m
<b>Depth / Draught</b>	<b>Depth:</b>	11.5m
	<b>Draught:</b>	8.7m
	<b>Freeboard:</b>	2812mm
<b>Length</b>	<b>Between Perpendiculars:</b>	120.4m
	<b>Registered:</b>	n/a
	<b>Overall:</b>	128.6m

#### Classification & Insurance (Clubs, ISM, ISPS, Societies)

<b>Clubs</b>	P&I : n/a
<b>ISM</b>	Vessel has no current ISM
<b>ISPS</b>	Vessel has no current ISPS
<b>Class</b>	Class: ABS (Americas)(AB) After 01 Aug 2006

#### Hull details (Hull Info, Ballast)

<b>Hull Info</b>	<b>Build Material:</b>	Steel
	<b>Deck(s):</b>	1
	<b>Watertight Compartments:</b>	n/a
	<b>Bulkheads:</b>	n/a
	<b>Hull Type:</b>	DH
	<b>Bulbous Bow:</b>	Y
<b>Ballast</b>	<b>Capacity (tonnes):</b>	5277
	<b>Segregated Capacity (tonnes):</b>	n/a

#### Facilities details (Details on available facilities)

Pumps	Total:	14	
	Description:	12 X 300 CBM/HR FRAMO DEEPWELL 2 X 100 CBM/HR SLOP FRAMO DEEPWELL	
	Capacity (Cubic):	n/a	
	Capacity (Tonnes):	n/a	
Tanks	Total:	14	
	Center Tanks:	n/a	
Tank Capacity	Liquid m <sup>3</sup> :	14257	
	Deck Tank m <sup>3</sup> :	n/a	
	Slop Tank m <sup>3</sup> :	694	
	Crude Capacity (Barrels):	88240	
	Crude Capacity (Metric):	n/a	
Coils	Tank Heated Coils:	STAINLESS STEEL	
Products	Number Of Grades:	13	
	Number Of Lines:	n/a	
Product Tanks	Wing Tanks:	12	
	Tank Coated:	PHENOLIC EPOXY (SIGMA)	
Lifting Gear (3)	Number	Type	SWL
	1	Crane	2.1
	1	Crane	10
	1	Crane	3

#### Machinery (Engines, Speed, Propellers, Boilers, Generators)

<b>Engines (1)</b>	<b>Type</b>	Diesel (1)
	<b>Power (Kilowatts)</b>	4440
	<b>Designed by:</b>	B&W Diesel
	<b>Built by:</b>	STX Engine Co. Ltd
	<b>Built at:</b>	Changwon (KOR)

<b>Primary Fuel Type</b>	<b>Position</b>	<b>Cylinders</b>	<b>Bore</b>	<b>Stroke</b>	<b>Fuel</b>	<b>Designation:</b>
	n/a	6	350	1400	Marine Diesel	6S35MC-MK7
	<b>Type</b>	Marine Diesel				

	Capacity	684				
	Consumption	n/a				
Propellers (1)	Number	1				
	Type	Fixed Pitch				
Boilers (1)	Type	Number	Auxiliary	Pressure	MPA	Heat
	Oil Fired	1	Auxiliary		9	0
Generators (3)	Generator Number	Power Type	Power	Current AC / DC		
	3	KW	480			

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## EXHIBIT 3



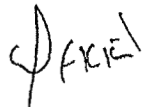
**V.Ships Limited**  
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13 Omonia Avenue  
P.O.Box 57115  
3312 Limassol, Cyprus  
Ph : +357 25 848400  
Fax: +357 25 560170  
Telex 4707 VSHIP CY  
Marinos.Sekkides@vships.com  
www.vships.com

**Limassol 14<sup>th</sup> May 2010**

**To whom it may concern**

We hereby confirm that the vessel **m/t Lynx (IMO nr.9388223)** with registered Owners being Camela Navigation Inc is within V.Ships Limited management since 27<sup>th</sup> of October 2008.

Yours faithfully

  
M.Sekkides  
V.Ships Limited  
Insurance Manager.

